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7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 vs.

12 ZACHARY SANNS,

13 Defendants.

2:20-cr-00265-JCM-BNW

**STIPULATION TO PERMIT  
TRAVEL**

14 **IT IS HEREBY STIPULATED AND AGREED**, by and between Christopher Chiou,  
15 Acting United States Attorney, and Christopher Burton, Assistant United States Attorney,  
16 counsel for the United States of America, and David T. Brown, counsel for defendant, that the  
17 defendant, Zachary Sanns be permitted to travel to Hawaii from August 20-25.

18 This stipulation is entered into for the following reasons:

19 1. At the time of Mr. Sanns' Detention pretrial services included a travel restriction  
20 as one of the conditions in their recommendation of pretrial release.

21 2. Mr. Sanns has a cousin that is getting married in Hawaii and would like to attend  
22 the ceremony with family.

23 3. Mr. Sanns has followed all directives of pretrial release and has been in regular  
24 contact with the undersigned.

25 4. Mr. Sanns is being supervised in New Jersey by Robert Hyde that Mr. Sanns has  
26 been compliant with all of the directives and that he had no specific concerns to the travel  
27 request.

28 5. U.S. Pretrial Services Officer Alicia Coughlin has indicated that she has no



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**FINDINGS OF FACT, CONCLUSIONS  
OF LAW, AND ORDER**

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16 **FINDINGS OF FACT**

17 Based on the pending Stipulation of counsel, and good cause appearing therefore, the  
18 Court finds that:

19 1. At the time of Mr. Sanns' Detention pretrial services included a travel restriction  
20 as one of the conditions in their recommendation of pretrial release.

21 2. Mr. Sanns has a cousin that is getting married in Hawaii and would like to attend  
22 the ceremony with family.

23 3. Mr. Sanns has followed all directives of pretrial release and has been in regular  
24 contact with the undersigned.

25 4. Mr. Sanns is being supervised in New Jersey by Robert Hyde that Mr. Sanns has  
26 been compliant with all of the directives and that he had no specific concerns to the travel  
27 request.

28 5. U.S. Pretrial Services Officer Alicia Coughlin has indicated that she has no

1 objection to this modification.

2 6. Mr. Sanns will provide U.S. Probation all of the travel details for his trip.

3 **ORDER**

4 **IT IS HEREBY ORDERED** that Zachary Sanns travel restriction be modified to permit  
5 him to travel to Hawaii August 20-25th.

6 All other conditions of pre-trial release shall remain.

7 **DATED** this 9<sup>th</sup> day of August, 2021.

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9   
10 THE HONORABLE NANCY J. KOPPE  
11 United States Magistrate Judge  
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